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### Remarks

After the foregoing amendment, claims 42 – 47 are pending, with claim 47 being the independent claim. Claims 1 – 41 have been cancelled and new claims 42 – 47 have been added.

#### *New Claims 42 – 47*

New claims 42 – 47 have been added to further define one embodiment of the invention. New claims 42 – 47 are directed toward a system for organizing a data set of information. The McGlew reference, alone or in combination, does not teach the claimed invention because McGlew does not teach the claimed data model, it only teaches a data set of information related to characters in a fantasy game. The combination of McGlew with Rao similarly fails to teach the claimed invention because Rao does not teach the claimed data model, it teaches a different data model based on a bottom up approach for organizing atomic data values as discussed in detail in Applicant's previous communication.

Furthermore, independent claim 42 requires in the structure of the data model that each data element, each frame, each event segment, and each link model is identified by a unique identifier. These unique identifiers are supported by the specification in part by the description found on page 16, lines 14 – 17. These identifiers are advantageous and unique to the claimed data model because they allow for separate databases conforming to the claimed data model to be merged without performing complex reconciliation operations. The combination of elements in the claimed computer implemented system for organizing a data set of information is not taught by the prior art and accordingly Applicant believes that new claims 42 – 47 are presently in condition for allowance.

#### *Advantages of the Claimed Invention*

Significant advantages are provided by the claimed invention that are not offered by conventional systems for organizing a data set of information. The McGlew reference does not teach any particular system of organizing its data set, but rather leaves those implementation details out. McGlew merely teaches a game that includes characters that are defined to create a data pool. The character data from McGlew can be organized according to any data model, for example, in a collection of flat files, in various "stick" and "slab" collections of atomic data values as taught by Rao, or in a relational database.

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While these conventional systems for organizing a data set of information have their own specific advantages and uses, none provide the significant advantages offered by the claimed system for organizing a data set of information. Initially, the claimed system can be employed by owners of vastly different types of content. Notwithstanding any differences in the content of data, however, two independent databases that each employ the claimed data model may be combined into a single database without performing any significant MERGE or JOIN function. This is true because the identifiers associated with each data element, frame, event segment, link, and link model are unique across all databases, regardless of the particular content. For example, when a single event segment is present in two separate databases, the event segment may have the same unique identifier in each database. Thus, when the two separate databases are merged, a link is created between all data elements that include the event segment.

In another example, a first database may be a collection of information about famous actors and a second database may be a collection of information about governors of California. Each database has a data element for Arnold Schwarzenegger and the Arnold Schwarzenegger data element has the same unique identifier in each database. When the two databases are combined, a link may be created from an event segment in the Arnold Schwarzenegger data element of the governor database that is defined by the start date of 2003 and an end date of 2007. This link would point to the Arnold Schwarzenegger data element in the famous actor database and through that link the two databases are combined into a single database. The motivation to create the link is provided by the presence in each database of the Arnold Schwarzenegger data element. Additional advantages of data reduction can also be enjoyed by eliminating duplicate data in the redundant data elements from the separate databases.

Sticking with the same example, an additional link may be created from an event segment in the Ronald Reagan data element defined by the date range 1967 to 1975. This link would point to the Ronald Reagan data element in the famous actors database. Additionally links may also be provided, but more than one link is not necessary for the two databases to be combined into a single database.

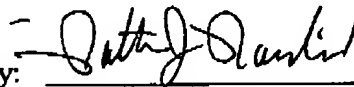
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**Conclusion**

Applicant believes that McGlew and Rao and the prior art of record do not teach the claimed computer implemented system for organizing a data set of information. McGlew teaches one example of a data set related to characters in a role playing game and Rao teaches a data model with a bottom up approach to organizing atomic data values. Combining the references merely teaches organizing the data set of McGlew with the data model of Rao and does not teach the claimed computer implemented system for organizing a data set of information. Accordingly, Applicant respectfully requests allowance of the pending claims.

Respectfully submitted,  
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